

Proposed Stipulation Emailed to Trial Counsel on March 14, 2024

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiffs,

v.

TERRAFORM LABS, PTE. LTD. and DO
HYEONG KWON,

Defendants.

Case No. 1:23-cv-01346 (JSR)

**STIPULATION REGARDING KANAV KARIYA'S
INVOCATION OF HIS RIGHTS UNDER THE FIFTH AMENDMENT
TO THE CONSTITUTION OF THE UNITED STATES**

1. Kanav Kariya is the President of Jump Crypto. He has held that position since September 2021.
2. Jump Crypto is part of the Jump Trading Group, which is a diversified financial firm headquartered in Chicago, Illinois.
3. Prior to becoming the President of Jump Crypto, Mr. Kariya served as Jump Trading's Director of Strategic Initiatives, Digital Assets. He held that position from September 2020 until September 2021. From July 2018 until September 2020, Mr. Kariya was a Quantitative Researcher at Jump Trading. Prior to that, Mr. Kariya was an undergraduate at the University of Illinois at Urbana-Champaign, earning his Bachelor of Science in Computer Engineering degree in June 2018.
4. During his deposition in this case, on the instruction of his attorneys, Mr. Kariya invoked his rights under the Fifth Amendment to the Constitution of the United States and declined to answer questions posed to him by both counsel for Plaintiff and counsel for the Defendants.

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5. Mr. Kariya's attorneys have advised the parties that, if Mr. Kariya were called to testify at trial, Mr. Kariya would again invoke his Fifth Amendment rights and decline to answer questions about the claims asserted in this case.

Dated: _____

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